



Winston H. Hickox
*Secretary for
Environmental
Protection*

State Water Resources Control Board

Division of Water Quality

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Gray Davis
Governor

September 14, 2001

Members and Alternates:

MEETING OF THE AB 982 PUBLIC ADVISORY GROUP

The AB 982 Public Advisory Group (PAG) will meet on September 24, 2001 at the California Chamber of Commerce, California Room, 1215 K Street, 14th Floor in Sacramento, California. If travel restrictions warrant, the meeting will be rescheduled. The decision to reschedule the meeting will be made in consultation with the Co-Chairs by September 19, 2001.

Please find enclosed the meeting agenda and the documents to support many of the agenda items. If you are planning to have handouts, please bring at least 40 copies for the PAG members and audience.

If you have any questions regarding the PAG or the meeting, please call me at (916) 341-5560. You may also call the new liaison to the PAG, Laura Sharpe at (916) 341-5596.

Sincerely,

Craig J. Wilson, Chief
Water Quality Monitoring Unit
Division of Water Quality

Enclosures

cc: Interested Parties

AB 982 Public Advisory Group

Monday, September 24, 2001 9:00 a.m. to 4 p.m.

California Chamber of Commerce
California Room
1215 K Street, 14th Floor
Sacramento, California

A G E N D A

1. *Convene Meeting – Co-Chairs* 9:00 a.m.—9:05 a.m.

2. *Introduction* 9:05 a.m.—9:15 a.m.
 - Steve Ekstrom
 - Description of the Meeting: The Total Maximum Daily Load (TMDL) Initiative and Action Plan will form the basis for the Board’s Second Report to the Legislature.

3. *July 16-17, 2001 Meeting Summary* 9:15 a.m.—9:20 a.m.
Action Item: Consider approval of Meeting Summary (Attached)

4. *TMDL Initiative and Action Plan* (attached) 9:20 a.m.—10:30 a.m.
 - Tom Mumley, Tom Howard
 - Overview presentation
 - Dialogue/discussion on the Initiative and overall plan and general issues

5. *Break* 10:30 a.m.—10:45 a.m.

6. *Public Advisory Group interaction and involvement with the TMDL Initiative and Action Plan* 10:45 a.m.—12:00 p.m.
 - Tom Mumley, Tom Howard
 - Dialogue/discussion on specific strategies/actions relative to PAG interests and potential involvement.

7. *Lunch* 12:00 p.m.—1:15 p.m.
8. *TMDLs in California: Diazinon in Urban Creeks* 1:15 p.m.—1:45 p.m.
- Presentation by Bill Johnson, SF Bay RWQCB
 - Dialogue
9. *The TMDL Initiative and Action Plan and the SWRCB's Report to the Legislature* 1:45 p.m.—2:30 p.m.
- Tom Mumley, Tom Howard
 - Dialogue/discussion on how the TMDL Initiative and Action Plan (and improvements to them) provide a base for the Report to the Legislature
10. *Break* 2:30 p.m.—2:45 p.m.
11. *Public Advisory Group's role relative to the SWRCB's Report to the Legislature* 2:45 p.m.—3:30 p.m.
- Tom Mumley, Tom Howard
 - Dialogue/discussion on PAG input to the Report to the Legislature, steps, and timeline
12. *Wrap-up and Next Steps* 3:30 p.m.—4:00 p.m.
13. *Adjourn* 4:00 p.m.

Agenda Item 3

July 16-17, 2001 Meeting Summary

AB 982 Public Advisory Group

Clarion Hotel, Brannan Room
700 Sixteenth Street
Sacramento, California

Meeting Summary

Monday, July 16, 2001

Convene Meeting: Co-Chairs Craig Johns and Linda Sheehan (substituting for David Beckman) opened the meeting at 1:30 p.m. without a quorum. Art Baggett, Chair of the State Water Resources Control Board (SWRCB), welcomed the Public Advisory Group (PAG) and introduced Celeste Cantu, SWRCB's new Executive Director. Celeste outlined her management philosophy, stressing the importance she places on collaborative efforts with stakeholders, as exemplified by the PAG.

Summary of March 26, 2001 meeting: Action on this item was deferred until a quorum of members was present.

TMDLs in California: The Trash TMDL and the Mercury TMDL: Jonathan Bishop, from the Los Angeles Regional Water Quality Control Board (RWQCB) gave a presentation describing the trash Total Maximum Daily Load (TMDL) for the Los Angeles River. Following this, Dr. Tom Mumley from the San Francisco Bay RWQCB gave a slide presentation of the mercury TMDL for the San Francisco Bay. PAG members had several questions for each presenter. Both were thanked by the PAG for their fine presentations.

Adjournment: The Co-Chairs adjourned the meeting at 4:00 p.m.

Tuesday, July 17, 2001

Location change: The meeting for this second day was changed to Grapes Restaurant, 815 11th Street in Sacramento.

Convene Meeting: The Co-Chairs David Beckman and Craig Johns opened the meeting at 8:50 a.m. and acknowledged that a quorum was present. Celeste Cantu, the SWRCB's Executive Director, welcomed the PAG and restated her management philosophy for the benefit of members who were not at the previous day's meeting. Pete Silva, member of the State Water Board, also welcomed PAG members.

Summary of March 26, 2001 meeting: With a quorum now present action was taken on the March 26, 2001 meeting summary. Craig Johns made the point that some of the comments attributed to him under the agenda "Review of the State Water Resources Control Board's TMDL Structure and Effectiveness Report" were made by others. Following discussion it was agreed to revise the summary to state that the points made in

the discussion were made by PAG members and not attribute them to any person. With the agreement that the summary would be changed accordingly, PAG accepted the March 26, 2001 meeting summary by a consensus vote.

It was also noted that there are a few roster changes to be made. Craig Wilson agreed to send out the current roster for everyone's review. Any proposed changes will require that each co-chair submit those changes in writing to Celeste Cantu, SWRCB Executive Director.

Measures Being Taken to Expedite the TMDL Process: The document that was mailed out with the agenda was the product of the TMDL team which highlighted steps being taken to speed up the TMDL process. PAG members had numerous comments:

- A strong evaluation component is lacking.
- There is no apparent internal structure that monitors overall progress of the TMDL program.
- It is now clearer than ever the SWRCB does not have a TMDL program.
- The pace of TMDL development is so slow that the SWRCB will not get them done.
- Many of the topics to expedite the process are good, but the PAG's suggestions are missing. For example, the PAG's SWAT team idea is not mentioned.
- The PAG wants the SWRCB to have a TMDL program.
- The PAG wants fast, quality, science-based TMDLs.
- Much disappointment was expressed that the PAG's comments were not on the list.
- It is remarkable that the PAG and its comments were not referenced in the document.
- The "strike team" issue is very important because the work of the Regions have to be transferable to other regions.
- Another way to expedite TMDL development is to develop them under contract.
- The SWRCB needs to show progress for the funding input. For example, be specific about what the PAG can expect in six months or a year.
- The SWRCB can play an important role in serving the Regions by reviewing the quality of the scientific information used.
- Focusing on the document attached for Item 9, significant disappointment was expressed about the lack of evaluation methodologies, evaluation criteria, lack of specificity in objectives and criteria.
- The SWRCB is way off track on developing TMDLs (many should have been completed this year to continue to meet long-term deadlines).
- The SWRCB needs to develop and implement guidance/procedures on the whole TMDL development effort. This "top-down" guidance will help the Regions avoid struggling through each TMDL.
- The SWRCB needs to show more productivity per Personnel Year (PY). Very little work is getting done with the resources that have been made available.
- The SWRCB have not answered many questions related to process. How do the environmental data enter the process?

- PAG members were troubled by fact the SWRCB can't give any guidance on the TMDL development process or 303(d) listing/delisting process. California should be leading the country in these areas.
- Other State agencies are problematic also. Frustration was expressed about Caltrans, Department of Conservation, Department of Forestry, and the Department of Pesticide Regulation.
- The only approaches that seem to work are lawsuits, but litigation is not sustainable.
- The SWRCB needs to show strong leadership.
- The SWRCB should think creatively to get higher level (more experienced) people on staff.
- The staff has to be productive to meeting the challenge of completing TMDLs.
- The SWRCB needs to flesh out timelines and deliverables for TMDLs. For example, what is the timeline for the TMDL master contract?
- SWRCB should use expertise across Regions.
- SWRCB should make better use of PAG to "push" for things that the State can't because of regulatory restrictions.
- On the next report document expediting efforts, staff should add timelines and expectations about future events/expectations.
- If SWRCB's efforts and results are better than what is written, then a better document should be prepared for PAG.
- Overall, the SWRCB, needs (1) more specificity in the TMDL documents, (2) to present the various deliverables, and (3) more productivity from its staff.

Surface Water Ambient Monitoring Program Update: Craig Wilson presented an overview of the report that was included with the agenda. Among other things, Craig discussed the proposed reference condition study (establishing a clean water baseline) and the formation of a scientific panel to "review, study and design approaches, indicators and other relevant topics."

PAG members offered some comments:

- The PAG would like to see the proposed names for the scientific panel before it is finalized.
- The PAG would like to be notified in advance of workshops.
- Suggestion: commit to a template or format for all data that is generated by the Boards' monitoring efforts.
- The PAG appreciated the thoroughness of the staff report and the progress that's been made.

National Academy of Sciences (NAS) Report – Assessing the TMDL Approach to Water Quality Management (Executive Summary): PAG members commented on the report:

- The NAS report is good for environmental and regulatory communities in that it advises to move forward since there is sufficient science.
- The report could be used as a basis for examining California's TMDL program.
- The report verified many of the points PAG made in its report last year, e.g., the value in balancing good science with moving ahead knowing that there will always be some uncertainty.
- The report underscores the need for budget increases (more PYs).
- The report underscores compliance monitoring.

Goals, Objectives, and Evaluation Criteria: Assessing Progress in the State's Efforts to Implement the Clean Water Act, Section 303(d): The PAG had many comments on the staff report:

- Evaluation criteria are missing; most of the "Work Elements" are too vague to be evaluated.
- PAG requests/recommendations not in the document.
- Comments about the goals: some are quite possibly illegal; some members wanted to simplify the goals; some felt the term "environment" should be in the goals; some felt goal 2 should be eliminated, while it was noted by another member that goal 2 seems to be paraphrased from Section 13000 of the Water Code.
- There's no mention of antidegradation.
- Objective 4 should be emphasized as it was a PAG consensus item; other PAG recommendations should be incorporated.
- None of the PAG's requests regarding the deficiencies in the State Report on the TMDL program structure are addressed. Structure is admittedly different than goals and objectives, but this document could have incorporated information on staffing or deliverables, as requested in the PAG TMDL report transmittal letter. Moreover, the detailed workplan PAG asked for by Legislative oversight committee is relevant to this.
- This document describes TMDLs as a very broad overarching effort. The TMDL program should be more discrete.
- Do not build watershed management into the TMDL program.
- Treat the TMDL program as a "silo" like other programs.
- The main goal of the TMDL program should be to achieve water quality standards.
- Include more policy language, e.g., when to halt stakeholder input
- Objective 5: make sure this objective includes public education and make sure enforcement is addressed.
- When implementing public hearing processes and in order to increase access, be sure there are meetings distributed throughout the State or Region.
- The web (i.e., Internet) needs to be woven through data management.
- It is impossible to separate TMDLs from watershed management and other programs.
- The document should focus on the implementation of the TMDL program.
- There's no mention of PAG reports to the Legislature.

- The document needs to be rewritten completely, the document is disjointed, lacks specificity and is poorly organized.

One PAG member submitted written comments on the staff report (attached).

Update: Development of the 2002 Section 303(d) list and Development of Listing/Delisting Policy: It was noted that the State should develop a policy statement per the PAG's recommendations from last year. Staff noted that there's currently an effort underway to develop policy for the 2004 listing. A member suggested that it would be good if PAG can react to the statement before it's finalized. Another member agreed, adding that the sooner a draft can get out for comment, the better.

Structure of the TMDL Program: PAG members had several comments:

- Please revise to explain what the SWRCB is doing as a program.
- This document reads more like a public relations piece.
- It appears to be wrong in the estimates for Region 4 and 8.
- The document doesn't describe the dire straights of the program.
- The document is inadequate to describe the structure of the TMDL program.
- There seems to be some internal struggle at the SWRCB because PAG's consensus recommendations and consensus legislation haven't been considered or agreed with.
- As presented, there is not enough productivity in completing TMDLs.
- The SWRCB-RWQCB "culture" is wrong and not working.
- There is clear difficulty in coordinating TMDL efforts (e.g., coordination of the Mercury TMDLs).
- Process comment: Need to know authors of reports.
- There appears to be no pride of authorship.
- The document sounds good, but it doesn't tell what the problems are.
- The report needs an honest assessment of what is needed to do the job and what the personnel are able to do.
- Compare resource needs to the number of water bodies, TMDLs to complete, etc.
- The comments are specifically focused on the SWRCB; not the RWQCBs.
- Each region should clearly state what's really needed to accomplish its goals.
- If this report is for the Legislature, it really needs to speak to the problems.
- There are some elements of structure in the report and therefore is a good start for the Legislative report.

Wrap-up: Some PAG members representing both regulated and environmental communities had just attended a lunch-time briefing on SB 710 revisions that SWRCB staff were preparing. During the PAG meeting wrap-up, both community representatives commented that the strong impression was that PAG's recommendations had not been taken seriously. If the State really does embrace stakeholder collaborative processes, as exemplified by the PAG, then it should take recommendations seriously and give them due acknowledgment. Some members commented that they would like to see the next version of document and have time to comment.

Public Comment: One person commented that it would be good to have “visuals” to accompany written documents (that are mailed out in advance of PAG meetings). Another person commended the PAG for its work to date and stated that its good the PAG is keeping an eye on the SWRCB.

Next Meeting: The next PAG meeting is scheduled for September 24, time and location to be determined.

Adjournment: The Co-Chairs adjourned the meeting at 3:00 p.m..

Comments submitted by a PAG member

In my opinion, the State needs to re-do the Draft 303(d) goals, objectives and evaluation criteria.

Overall:

- 1) There are no evaluation criteria in here.
- 2) Everything lacks specificity and therefore is not helpful. Also, many of the work elements listed merely reiterate things already being done. The SWRCB will not create any policies that affect this year's listing cycle because they do not want to get sued for underground rulemaking. However, this document supposedly concerns future listing cycles, and thus should be able to be more specific.
- 3) None of the PAG's requests regarding the deficiencies in the State Report on the TMDL program structure are addressed. Structure is admittedly different than goals and objectives, but this goals document could have incorporated information on staffing or deliverables, as requested in our PAG TMDL report transmittal letter. Moreover, the detailed workplan we asked a legislative oversight committee for is relevant to this. Where is it?
- 4) The PAG (or its recommendations) are not mentioned at all. The PAG should at least be part of the evaluation criteria.

- **Goals**

ANTIDegradation IS MISSING: Should be *restoring* and maintaining beneficial uses (see, e.g., PAG Report, p. 6).

Cf. NAS TMDL report mentions control of BOTH point and nonpoint sources of pollution. This SWRCB document does not.

Objective #4 should be a higher priority—it was a big point of PAG CONSENSUS.

“Access” and/or rather than just “Understanding.”

- **Id, List and Prioritize Impaired Waters**

PAG ISSUES AND RECOMMENDATIONS ARE NOT ADDRESSED: See PAG recommendations: top of page 10, PAG Report. Specifically, consistency among Regional Boards is not addressed in this document. Utilization of data is not really addressed. Amount of scientific rigor needed not addressed (regardless of whether it is the environmental or regulated caucus's view). The SWRCB needs to commit to addressing these issues.

Does address adequacy of funding/personnel to some degree. Does discuss statewide monitoring to some degree.

NO EVALUATION CRITERIA. Ultimately, the only way to evaluate the 303(d) listing process is to see waters improve.

“Develop a Policy” is to direct “revisions,” not, as the PAG recommended, to direct “how Regional Boards should maximize consideration of existing data.”[PAG CONSENSUS POINT]

- The only good thing here is the public process. How long would this take? Two years?
- The CWA fairly specific on how things may be listed and delisted, and doesn't any policy need to adhere to these federal requirements? (Say so in this document!)
- Need a timeline.
- “Develop” or “consider” What is the difference? And what does it mean anyway?
- What is the weight of evidence approach, etc.?

SWAMP stuff is good.

Data storage mechanism? Isn't the SWRCB doing this already with SWIM and STORET? Also, no mention of need to ensure public access in a user-friendly manner.

- **Develop Water Quality Attainment Strategies that address all waters, lead to corrective actions, manage in a watershed context, satisfy legal requirements.**

PAG RECOMMENDATIONS SHOULD BE ADDRESSED: This heading is really just the same as developing the TMDL program itself, and therefore the PAG recommendations should be specifically addressed in this document.

NO EVALUATION CRITERIA.

The SWRCB has already established dialogues (isn't that what the PAG is for?). Moreover, watershed stakeholder groups have disproportionate representation, and there are no elements that address this issue (like funds for interested 501s to travel etc.)

“pursue opportunities to integrate other program objectives...” What opportunities? This skirts around the PAG'S SUMMARY RECOMMENDATIONS/CONSENSUS to coordinate better with agencies.

“Use staff and contract \$\$ to secure necessary information to provide adequate scientific basis.” Where is the policy development as requested by the PAG? The SWRCB is going to decide on a case by case basis. Maybe they need to allow Regional Boards to do it this

year, but certainly not in the future. This is one of the major things slowing the Regional Boards down.

Collaborate how? Encourage what kind of initiatives, and how?

The Basin Plan stuff is just too ambiguous and unspecific to comment.

Note that the SWRCB did say they would include TMDL implementation plans in the Basin Plan amendment.

What does “evaluate the costs” mean? This is going to be on a waterbody by waterbody basis? No commitment to addressing the hard issues with policy guidance.

What is the statewide tracking program to be implemented?

Talk to us more about the statewide TMDL database. This is interesting. Can we lock in any more specifics?

Need specifics about training. Timeline, minimum resources to be devoted, etc.

How is the “roundtable” different from the PAG? Is it an academically oriented or scientific group? How is it not redundant?

- **Implement corrective and protective actions**

What specific implementation features? This looks interesting, but totally needs specifics.

- **Actively seek and manage resources**

FIRST UNDER THIS ITEM SHOULD BE SUPPORT PAG LEGISLATION TO IMPROVE THE PROGRAM. If work elements are “seek legislative changes that support timely completion of water quality attainment strategies;” “work with stakeholder groups and interested parties to develop “acceptable” legislative initiatives,” then the State should support PAG legislation!

Also, as per the CBI, disbursements in a more flexible process.

Will pollutant trading be evaluated in a public process?

Master contract legislation? Whatever happened to it?

- **Ensure Public Need for Understanding**

-Commit to a specific year when storm water data and industrial storm water data will be available on the web.

-All reports must be electronically available.

Agenda Item 4

Total Maximum Daily Load (TMDL) Initiative
and TMDL Initiative Action Plan

State Water Resources Control Board
Total Maximum Daily Load (TMDL) Initiative
September 2001

California is faced with the challenge of producing Total Maximum Daily Loads (TMDLs) to resolve over 1400 waterbody/pollutant impairments. This Initiative is being established to ensure that the TMDL effort in California results in tangible water quality improvements in the shortest possible time. This initiative establishes an ongoing process to ensure the highest level of performance from the available TMDL resources as well as seeks ways to augment TMDL resources. It is imperative to the State Water Resources Control Board (State Board) and Regional Water Quality Control Boards (Regional Boards) that the TMDL effort: contributes to solving water quality problems; is conducted expeditiously and efficiently; is focused on the most compelling water quality improvements; and enhances our ability to attain and maintain water quality standards.

Management of water quality is becoming increasingly difficult. We now face situations that involve relatively complex environmental assessments, necessitate integrated responses of multiple agencies at various levels of government and in the private sector, involve issues of deep seated social behaviors or perceptions, and rely on multiple regulatory and bureaucratic avenues.

To address this level of complexity, three overarching goals are established for the TMDL effort:

- Improve **TMDL program performance** in California;
- Enhance **communication** among the State Board, Regional Boards, and stakeholders; and
- Enhance **collaboration and support among all stakeholders**, including the public, the regulated community, other regulatory and resource agencies; and the State and Regional Boards.

These goals will be pursued through a TMDL Initiative Action Plan that describes specific steps to be undertaken in the nine strategic elements described below. Each strategic element addresses one or more of the goals listed above:

- A. TMDL Program Structure and Management
- B. Information Management
- C. TMDL Toolbox and Guidelines
- D. Outreach, Communication, and Participation
- E. Early Implementation
- F. Monitoring and Assessment
- G. Basin Planning
- H. TMDL Implementation
- I. Budget Development and Management

The Action Plan contains specific tasks and milestone, and will be maintained as a living document undergoing revisions as needed, but no less often than every six months. In this way, State and Regional Board managers and staff, the regulated community, and other members of the interested public can be kept abreast of the latest strategic thinking about program direction and improvements. In addition, specific annual workplans and a three-year planning schedule will be used by the Regional Boards to plan for and carry out specific TMDL work. This combination of specific regional planning and statewide

strategic planning will ensure active and effective implementation of the TMDL program and maintain a focus on compelling water quality problems.

The most expedient opportunities to correct water quality problems will be pursued. This means that solutions, other than a complete TMDL, that provide tangible water quality improvements may result from the TMDL process.

DRAFT-----DRAFT-----DRAFT

**TOTAL MAXIMUM DAILY LOADS
(TMDL) INITIATIVE
ACTION PLAN**

Edition 1.0

(9/14/01)

STATE WATER RESOURCES CONTROL BOARD
California Environmental Protection Agency

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TMDL INITIATIVE ACTION PLAN

Edition 1.0 (under development; revised 9/14/01)

I. PURPOSE/GOALS

The purpose of the Total Maximum Daily Load (TMDL) Initiative Action Plan is to identify strategies and specific actions to be taken to meet the three goals of the TMDL Initiative: (1) improve TMDL program performance; (2) enhance communication among the State Water Resources Control Board (State Board), Regional Water Quality Control Boards (Regional Boards), and stakeholders; and (3) enhance collaboration and support among all stakeholders, including the State and Regional Boards, other regulatory and resource agencies, the regulated community, and the public. Because the strategies and actions needed to support these goals are expected to change to some degree over time, this Action Plan is a dynamic planning document that will be revised in subsequent editions. Edition 1.0 focuses on strategies and actions identified to promote statewide TMDL efforts in the near-term.

II. TMDL DEFINED

As used in this Action Plan, the term TMDL means a process to design and implement programs, policies, and actions that result in correcting water quality impairments and sustaining water quality improvements. A complete TMDL includes documentation that satisfies the Clean Water Act Section 303(d) requirements and State law pertaining to water quality management, amendments to Basin Plans, California Environmental Quality Act (CEQA), and administrative requirements. A TMDL includes measurable features that describe attainment of the applicable water quality standard and an allocation of the responsibility to take corrective actions. This definition is broader than the Clean Water Act definition of a TMDL as a calculation of the maximum allowable pollutant load.

The timelines and documentation associated with a complete TMDL, as used in this Action Plan, are considerably more extensive than those associated with merely calculating the maximum pollutant load. More importantly, the complexity of designing and implementing integrated efforts to achieve water quality improvements is far greater than calculating loads. Therefore, the workload and time requirements associated with this Action Plan envision time frames that often extend several years into the future. This Action Plan also envisions extensive involvement of stakeholders in the TMDL process, and therefore contains many features designed to communicate with and engage stakeholders in the process. These more expansive characteristics of a TMDL are implicit in the definition of a TMDL as used in this Action Plan. A TMDL may also address more than one pollutant/water body combination listed on the 303(d) list of impaired waters. Currently 1472 pollutant/water body combinations are listed and it is estimated that approximately 800 TMDLs will be needed to address all of these listings.

III. CURRENT PROGRAM DESCRIPTION

Currently, 94.5 Personnel Years (PYs) are dedicated to TMDL development; 28.5 PYs are supported through federal grants and the balance is funded through the State General Fund. Total direct support for TMDL work amounts to \$11.5 million per year, of which \$8.9 million is for staff and \$2.6 million is for contract support. General oversight and program direction is

provided by statewide coordination through the Management Coordinating Committee (MCC), comprised of State Board Executive management and Regional Board Executive Officers. The state TMDL Coordinator provides budget and administrative support and general technical assistance.

TMDL work is planned and scheduled on an annual, three-year, and five-year basis. In addition, at each revision of the impaired waters list a long-term schedule and priorities for TMDL development is established. The one-, three-, and five-year schedules are consistent with the long-term priorities but we may modify the schedule to take advantage of opportunities that arise. Work is being conducted in all regions and at the State Board. In some cases, court supervised consent decrees have established schedules for development of technical work leading to the federally required total load calculation. In the North Coast Region (Region 1), this schedule precludes the ability to develop Basin Plan amendments and a complete TMDL as described above, given the current level of support. In the Los Angeles Region (Region 4), the consent decree schedule has allowed for developing TMDLs as Basin Plan amendments to date, but the pace accelerates in coming years and under the current staffing level most, if not all, future work may be truncated to technical load calculations. In these consent decree cases, the U.S. Environmental Protection Agency (USEPA) is required to establish the technical load calculations as TMDLs that meet federal requirements. These USEPA-established TMDLs do not include the management and implementation features included in State-adopted TMDLs.

IV. CURRENT TMDL PROGRAM COMMITMENT

Commitments to complete TMDL work are established annually in the TMDL workplan which reflects allocated resources. The three-year, five-year, and long-term schedules are planning tools and are contingent on availability of resources. Currently the State Board estimates that adhering to the long-term schedule would require more than doubling the current level of support. The workplan for FY 2001-02 identifies work to be undertaken to continue development of 144 TMDLs (this number includes the technical support documents used by USEPA for establishing TMDLs). Thirty-two of these are scheduled for Regional Board consideration by December 2002 (see Appendix, Table 1). This Action Plan describes activities above and beyond these existing commitments. To carry out these new activities staff will need to be redirected from existing work (no new resources were provided in the current fiscal year). In some cases this may lead to temporarily slowing the pace of TMDL development in the regions and may require adjusting this year's workplan commitments. However, it is believed that all the activities described in this Action Plan will quickly result in enhancements to the overall effort and expedite the pace of TMDLs in the near future.

V. TMDL INITIATIVE TEAM

The TMDL Initiative and Action Plan are being coordinated by a team (Initiative Team) led by the Statewide TMDL Program Manager, Tom Mumley (San Francisco Bay Regional Board). The other team members currently are: Tom Howard (State Board Deputy for Water Quality and Policy Development), Stefan Lorenzato (TMDL Coordinator, State Board Division of Water Quality), Gail Linck (State Board Office of Statewide Initiatives), and Greg Gearheart (State Board Office of Statewide Initiatives). Additional staff will be added to the team as needed.

VI. STRATEGIES

In this edition of the Action Plan, we present nine strategies for meeting the goals of the TMDL Initiative and the Strategic Plan. These strategies are interrelated and dynamic, and may be integrated, deleted, or augmented in subsequent editions of the Action Plan. Brief descriptions of the nine strategies are presented below. The actions, tasks, products, and due dates for each strategy are presented in Section VII.

A. TMDL Program Structure and Management

We will assess the current program structure related to TMDL efforts and establish improvements and organizational options to address them. We will identify the interrelationship of TMDL efforts with other water quality programs and establish mechanisms to ensure effective program collaboration and integration. The role of management advocates with responsibility for TMDL efforts and integration of TMDL efforts with other water quality programs will be defined, and individuals will be assigned to these new roles. We will establish communication procedures and expectations within the TMDL program and related programs.

B. Information Management

We will establish a user-friendly information management system as part of the existing System for Water Information Management (SWIM) and enhancements to SWIM. This system will include data on all TMDL projects, with more detail for TMDL projects within a 3-year planning horizon, and even more detail associated with tasks in the active fiscal year. The latter will be part of an effort to produce electronic workplans (e-workplans). The information and data in the system will also be used to produce fact sheets, workplans, and other reports for specific TMDL projects. Intranet and Internet web sites will be established for access to the information and relevant products. Contract mechanisms such as master contracts and tracking mechanisms will also be built into the system.

C. TMDL Toolbox and Guidelines

We will produce tools and guidelines for listing and delisting impaired water bodies, developing TMDLs, and implementing the TMDL program. These products will include technical tools, methods and procedures for their use, and regulatory and policy tools, guidelines, and procedures for their use. Tools and guidelines will be produced for 303(d) listings, categorical TMDLs (pathogens, pesticides, metals, etc.), and generic TMDL elements (numeric targets, linkage analysis, etc.).

D. Outreach, Communication, and Participation

We will develop tools, mechanisms, and procedures to enhance external (other agencies, stakeholders, and public) outreach, communication, and participation. Successful development of TMDLs will require participation and support of various stakeholders. Inherent to this participation and support is the need to ensure that stakeholders are informed of and understand the issues associated with developing the TMDLs. These efforts will include creating and

identifying opportunities to enhance collaboration and cooperation with other agencies and stakeholders, more effectively describing and reporting on TMDL activities, and providing forums for information exchange. Actions will include general and specific outreach and communication efforts, stakeholder participation and collaboration, and coordination and collaboration with other agencies.

E. Early Implementation

We will pursue opportunities for early actions that promote or possibly eliminate the need for TMDLs using existing authorities, program integration, process improvements, and stakeholder assistance and collaboration. Such opportunities may include: evaluating existing actions that may be recognized in the implementation plan for a TMDL; groundtruthing or pilot testing potential actions that may or are being considered for an implementation plan; and identifying and evaluating actions that if implemented may negate the need for a TMDL, such as implementation of existing technology-based requirements or enhancements of them, or clean-up and abatement of hotspots or illicit discharges.

F. Monitoring and Assessment

We will continue to design and implement a comprehensive statewide Surface Water Ambient Monitoring Program (SWAMP) to improve identification of impaired or threatened waters. We will augment SWAMP, where appropriate, with monitoring required by or associated with other water quality programs (NPDES, Storm Water, Nonpoint Source programs, etc.) and with monitoring conducted by other agencies (U.S. Geological Survey, Department of Water Resources, Department of Pesticide Regulation [DPR], etc.).

G. Basin Planning

We will streamline and improve the existing basin planning process based on the new Administrative Procedures Manual chapter on basin planning through training, enhanced coordination and communication, and resourcefulness. We will also pursue options to revise or modify the existing process.

H. TMDL Implementation

We will establish procedures and requirements to implement TMDLs in general and to implement specific TMDLs. We will establish procedures to track and enforce TMDL implementation actions and to monitor effectiveness of actions. We will also establish adaptive management procedures to ensure that implementation actions result in attainment of water quality standards. We will use and enhance existing regulatory mechanisms, and where necessary, establish new ones or seek collaboration with other agencies with applicable authorities.

I. Budget Development and Management

We will address budget issues relevant to TMDL efforts. They include: assessment and management of existing budget allocations; use or redirection of funds associated with other programs; development of initiatives to seek additional resources through the State budget process; and development of initiatives to seek resources through external sources such as dischargers or other collaborators.

VII. ACTIONS TO IMPLEMENT THE STRATEGIES

Described below for each strategy are actions, tasks, products/deliverables, and due dates. With each edition of the Action Plan, these elements will be updated and expanded. Table 2 in the Appendix provides a compilation of all the actions and products and the timeline for them.

A. TMDL Program Structure and Management

We will articulate and solidify expectations for TMDL development, products, and timelines, and communicate these expectations to all staff involved in TMDL development. The current program structure related to TMDL efforts will be assessed, and improvements and organizational options to address them will be identified and established. We will identify the interrelationship of TMDL efforts with other water quality programs and establish mechanisms to ensure effective program collaboration and integration. Roles and responsibilities of management and staff within the TMDL program and other water quality programs will be articulated. The role of management advocates with responsibility for TMDL efforts and integration of TMDL efforts with other water quality programs will be defined, and individuals will be assigned to these new roles. We will establish communication procedures and expectations within the TMDL program and related programs.

Action 1: Program Structure Assessment and Improvement

Description: The expectations of the TMDL Program at the State Board and the Regional Boards will be articulated. Expectations for products, timelines, process content, and legal commitments will be communicated to all staff. The TMDL program structure will be reviewed and evaluated accordingly. Improvements and options will be identified and established.

Tasks:

- Articulate expectations regarding TMDL program objectives and products.
- Assess current program structure, including roles and responsibilities of State and Regional Board TMDL Team members and staff of related programs.
- Identify needed improvements in program structure and present organizational options to address them to MCC.
- Implement program improvements approved by MCC.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Statement of expectations regarding TMDL program objectives and products	September 2001
Report on program structure assessment	October 2001
Program Structure Improvement Plan	October 2001
MCC review and approval of plan	November 2001
Implement structural improvements	Ongoing (beginning November 2001)

Action 2: Program Integration

Description: TMDL efforts encompass activities associated with nearly all other water quality programs. We will establish a clear understanding of these interrelationships and establish mechanisms to ensure effective collaboration and integration of program efforts, and to prevent conflicts or redundancies between these programs and TMDL efforts.

Tasks:

- Identify programs (e.g., NPDES, Storm Water, and Nonpoint Source programs) associated with TMDLs in general and with specific TMDL projects.
- Describe interrelationships between TMDLs and these programs.
- Identify roles and responsibilities of these programs and program staff, and establish management advocates or other mechanisms to ensure effective collaboration and integration, and to prevent conflicts or redundancies between these programs and TMDL efforts.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Matrix of TMDL projects and affected programs	October 2001
Program interrelationship report with opportunities for improvement	November 2001
Identify key roles and responsibilities to maintain and improve integration	December 2001
Assign staff or functions as necessary to ensure integration	Ongoing (beginning December 2001)

Action 3: Program Management

Description: We will review the roles and responsibilities of management and staff within the TMDL program at the State Board and Regional Boards. This effort will include executive management and division management at the State Board, the Management Coordinating Committee (State Board management and Regional Board Executive Officers), the Assistant Executive Officers, the Statewide TMDL Program Manager, the

TMDL Program Coordinator, the TMDL Roundtable, and others as necessary. The role of TMDL management advocates will be defined. We will identify key individuals to serve as management advocates with responsibility for TMDL efforts (including the TMDL Initiative and this Action Plan), and integration and coordination of TMDL efforts with other water quality programs and the Strategic Plan. We will establish communication procedures and expectations with the TMDL program and interrelated programs.

Tasks:

- Review management roles and responsibilities.
- Define the role and responsibilities for management advocates.
- Identify management advocates.
- Establish management advocates expectations for TMDL efforts and products (including the TMDL Initiative and this Action Plan) and integration and coordination of TMDL efforts with other water quality programs and the Strategic Plan.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Roles and responsibilities of management advocates	September 2001
TMDL program management description	September 2001
Report on expectations of management advocates	November 2001
Memorandum announcing the State and Regional Board management advocates for TMDLs.	November 2001

Action 4: Internal Communication

Description: The importance and complexity of the TMDL program and its interrelationship with other water quality programs calls for effective internal communication. Communication expectations and procedures within the TMDL program and interrelated programs will be established.

Tasks:

- Convene semiannual (fall and spring), two-day TMDL symposiums (Day 1 – discussion sessions; Day 2 – training).
- Identify key communication expectations (management to staff, program to program, State Board to Regional Boards, etc.) and pathways.
- Establish communication procedures.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
TMDL symposium	October 2001
Key communication pathways and expectations pathways	November 2001
Communication procedures	December 2001
TMDL symposium	April 2002

B. Information Management

We will establish a user-friendly information management system as part of the existing System for Water Information Management (SWIM) and enhancements to SWIM. This system will include data on all TMDL projects, with more detail for TMDL projects within a 3-year planning horizon, and even more detail associated with tasks in the active fiscal year. The latter will be part of an effort to produce electronic workplans (e-workplans). The information and data in the system will also be used to produce fact sheets, workplans, and other reports for specific TMDL projects. Intranet and Internet web sites will be established for access to the information and relevant products. Contract mechanisms such as master contracts and tracking mechanisms will also be built into the system.

Action 1a: Database Enhancement - Phase One

Description: An existing database in MS Access will be converted to Oracle as part of development of SWIM and e-workplans. The database will include relevant information for all TMDL projects underway. This will include specific tasks/products that will be conducted/produced during the current fiscal year, and associated personnel and contract resources. Projected tasks/products and associated personnel and contract resources for the next two fiscal years will also be entered into the database.

Tasks:

- Convert database to Oracle with enhanced (early) milestones/tasks fields and prepare user guide.
- Enter data for FY 2001/02.
- Define reporting needs, incorporate appropriate formats for reports into database, and revise user guide.
- Produce report(s) based on FY 2001/02 data.
- Enter data for FYs 2002/03 and 2003/04.
- Produce report(s) based on FY 2001/02 data.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Complete database conversion and user guide	September 2001
Complete FY 2001/02 data entry	October 2001
Reports formats and revised user guide	October 2001
FY 2001/02 report(s)	November 2001
Complete data entry for FYs 2002/03 and 2003/04	November 2001

Action 1b: Database Enhancement - Phase Two

Description: The database will be enhanced for planning, reporting, contract tracking, and implementation purposes. Additional information/data fields will include:

- TMDL project problem definition, approach description, major work focus, and weak link(s) or obstacle(s).
- Water quality programs affected.
- Type/extent of stakeholder participation (e.g., mail list, staff workshops, watershed stewardship group with Regional Board lead, Watershed Group with Regional Board participant, TAC, PAG, etc.)
- Interagency coordination required/desired.
- Early implementation focus -- status, opportunities, projects, regulatory options
- Contract tracking information field (e.g., contract #, amount, scope, contractor)
- Implementation milestones (e.g., projects, contacts, lead, duration, Nonpoint Source Management Measures, PYs, contracts, fund source).

The additional information and data associated with these enhancements will be used to produce workplans and fact sheets for TMDL projects and improved justification for project tasks, costs, and timing.

Tasks:

- Define and create enhanced information/data fields and revise user guide.
- Enter additional information/data.
- Define/design enhanced reports/products, incorporate appropriate formats into database, and revise user guide.
- Produce TMDL project workplans/fact sheets.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Complete enhanced fields and user guide	December 2001
Complete additional information/data entry	January 2002
Enhanced report formats and revised user guide	February 2002
TMDL project workplans/fact sheets	March 2002

Action 2: E-Workplan

Description: An important application of the database will be production of electronic workplans (e-workplans). The information/data in the database associated with TMDL phase (TMDL development, implementation planning, basin planning, and implementation), milestones, tasks, costs, and timelines will be used to generate reports that will serve as the annual fiscal year workplans for the TMDL program.

Tasks:

- Generate e-workplan for FY 2001/02 based on database and data entered via Action 1a.
- Generate draft e-workplan for FY 2002/03.
- Revise FY 2002/03 data to reflect FY 2002/03 budget.
- Produce final e-workplan for FY 2002/03.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
FY 2001/02 e-workplan	October 2001
Draft FY 2002/03 e-workplan	March 2002
Revise FY 2002/03 data	June 2002
FY 2002/03 e-workplan	July 2002

Action 3: Intranet/Internet Web Pages

Description: Produce appropriate Intranet/Internet access to database, e-workplans, and other products.

Tasks, products, and due dates, etc. to be determined.

Action 4: Tracking Reports

Description: TMDL program workplans will be regularly developed to describe the intended work in the upcoming one- and three-year periods. Reports on the progress of this work will be produced and reviewed on a regular basis.

Tasks, products, and due dates, etc. to be determined.

Action 5: Legislature Reports

Description: Annual reports to the legislature required by Section 13191 of the California Water Code on the structure and effectiveness of the water quality program as it relates to Section 303(d) of the Clean Water Act. Additional reports are often required by budget control language.

Tasks, products, and due dates, etc. to be determined.

Action 6: Contract Development and Management

Description: Regional Boards rely heavily on their ability to contract for special services needed to complete specific TMDLs. To improve the efficiency of the contracting process, master contracts can be established with the University systems and private consultants to provide TMDL support through a task order mechanism. Initially a master contract with the University systems will be developed. A companion master contract for private sector consultants will follow. The University master contract will be limited to TMDL tasks that match the teaching and research mission of the universities. The private sector contract will be designed to provide broad TMDL support, including technical, administrative, and public process work.

Tasks, products, and due dates, etc. to be determined.

C. TMDL Toolbox and Guidelines

We will produce tools and guidelines for listing and delisting impaired water bodies, developing TMDLs, and implementing the TMDL program. These products will include technical tools, methods and procedures for their use, and regulatory and policy tools, guidelines, and procedures for their use. Tools and guidelines will be produced for 303(d) listings, categorical TMDLs (pathogens, pesticides, metals, etc.), and generic TMDL elements (numeric targets, linkage analysis, etc.).

Action 1: Impaired Water Bodies Listing/Delisting Tools and Guidelines

Description: The State Board has stated its intent to develop a policy to guide those involved in the listing and delisting of impaired waters (pursuant to Clean Water Act Section 303(d)). The 2002 listing process is currently underway and an official policy cannot be developed in time to apply to the current list process. The 2002 listing effort will instead be used as a scoping mechanism to develop an official policy. The policy will seek to provide consistency among the regions and DWQ in the assessment of data, and in the prioritization of listed waters. The State Board also will address aspects of data quality and sufficiency.

Tasks:

- Summarize key points in Regional Board workshops and meetings related to 303(d) listing.
- Summarize key public comments on 2002 list.
- Develop working draft listing policy.
- Conduct public workshops on working draft.
- Develop draft policy.
- Conduct State Board public hearing process (hearing, workshop, response to comments, and adoption).
- Provide Regional Board training and technical support for new policy.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Preliminary summary of key issues	December 2001
Revised summary of key issues	March 2002
Working draft policy	May 2002
Draft policy	October 2002
State Board consideration	January 2003
OAL review	February 2003

Action 2: Categorical TMDL Tools and Guidelines

Description: Tools and guidelines for developing and implementing categorical TMDLs (pathogens, pesticides, metals, etc.) will be produced by forming workgroups of State and Regional Board staff with experience and/or expertise in categorical TMDLs. These will include: how to address the programmatic and technical aspects of TMDL development, including criteria for level of effort (how much is enough); identification of the TMDL elements that are significant and/or pose particular problems (coordinate with Action 3); stakeholder involvement opportunities and issues; interagency issues (collaboration/conflict); and early implementation opportunities. Key to the success of these workgroups will be provision for meeting management, facilitation, and product production support (contract).

Tasks:

- Form categorical TMDL workgroups.
- Compile relevant literature, existing products, and existing tools.
- Identify additional tools, needs, and issues, and schedule for their production, evaluation, and/or resolution.
- Complete compilation of technical tools, methods, and procedures for their use, and regulatory and policy tools, guidelines, and procedures for their use.
- Initiate appropriate approval mechanisms for tools and guidelines.
- Establish standing workgroups or “strike teams” to aid the use of tools and guidelines and to update/revise them as necessary.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Form workgroups	October 2001
Compilation of existing tools	January 2002
Identification of additional tools, needs, and issues	February 2002
Complete compilation of tools and guidelines	September 2002
Initiate approval process	September 2002
Establish standing workgroup or “strike teams”	September 2002

Action 3: TMDL Elements Tools and Guidelines

Description: Complete TMDLs consist of several elements: problem statement, numeric targets, source analysis, linkage analysis, allocations, margin of safety, implementation plan, and monitoring/re-evaluation plan. Tools and guidelines for each of these elements will be produced by workgroups of State and Regional Board staff with experience and/or expertise in these elements. This action area will be coordinated closely with and segue from Action 2.

Tasks:

- Form TMDL element workgroups.
- Compile relevant literature, existing products, and existing tools.
- Identify additional tools, needs, and issues, and schedule for their production, evaluation, and/or resolution.
- Complete compilation of technical tools, methods, and procedures for their use, and regulatory and policy tools, guidelines, and procedures for their use.
- Initiate appropriate approval mechanisms for tools and guidelines.
- Establish standing workgroups or “strike teams” to aid the use of tools and guidelines and to update/revise them as necessary.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Form workgroups	June 2002
Compilation of existing tools	October 2002
Identification of additional tools, needs, and issues	November 2002
Complete compilation of tools and guidelines	March 2003
Initiate approval process	March 2003
Establish standing workgroup or “strike teams”	March 2003

Action 4: TMDL Program Guidelines

Description: The products of the workgroups dedicated to categorical TMDL tools and TMDL elements will be coalesced into consolidated guidelines for developing TMDLs. This effort will require coordinating the efforts of these workgroups, compiling their recommendations, and developing the consolidated guidelines. Products of the workgroups will be implemented as soon as possible and in some cases will precede establishment of the consolidated guidelines. Table 3 in the Appendix contains a schedule for producing TMDL guidelines via the combination of Actions 2, 3, and 4.

Tasks:

- Coordinate efforts of categorical and TMDL element workgroups.
- Develop consolidated TMDL development guidelines.

- Conduct approval mechanism for guidelines.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Develop consolidated TMDL development guidelines	July 2003
Establish final TMDL development guidelines	January 2004

D. Outreach, Communication, and Participation

We will develop tools, mechanisms, and procedures to enhance external (other agencies, stakeholders, and public) outreach, communication, and participation. Successful development of TMDLs will require participation and support of various stakeholders. Inherent to this participation and support is the need to ensure that stakeholders are informed of and understand the issues associated with developing the TMDLs. These efforts will include creating and identifying opportunities to enhance collaboration and cooperation with other agencies and stakeholders, more effectively describing and reporting on TMDL activities, and providing forums for information exchange. Actions will include general and specific outreach and communication efforts, stakeholder participation and collaboration, and coordination and collaboration with other agencies.

Action 1: Public Advisory Group (PAG) Involvement and Collaboration

Description: We will seek advise on the TMDL Initiative and this Action Plan from the Public Advisory Group (PAG) that has been established pursuant to AB 982 to assist in the evaluation of TMDL program structure and effectiveness. We will start by referencing this Action Plan to the PAG consensus recommendations received to date. In the spirit of enhancing collaboration between the PAG and the State Board, we will also seek PAG comments on developing and implementing the strategies and actions of this first edition Action Plan and subsequent editions. Areas where we will seek assistance from the PAG include, but are not limited to, implementing opportunities to improve the basin planning process, developing legislative reports, pursuing needed legislative changes to support or improve TMDLs or the TMDL process (e.g., budget initiatives, basin planning), and engaging other agencies in TMDL development and early implementation. [*Note: Comments from the PAG will be considered prior to finalizing the first edition of this Action Plan in October 2001.*]

Tasks:

- Cross-reference Action Plan strategies and actions with PAG consensus recommendations.
- Solicit input from PAG on developing, evaluating, and implementing existing and additional Action Plan strategies and actions.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Table of strategies/actions versus consensus recommendations	September 2001
Distribute draft TMDL Initiative and Action Plan for PAG review (discuss at September 24, 2001 PAG meeting)	September 2001
Receive and consider comments from PAG in revising draft and producing final Action Plan - Edition 1.0.	October 2001

Action 2: Stakeholder Involvement and Collaboration

Description: Identify and create opportunities to enhance involvement and collaboration with stakeholders. These efforts will include improved outreach and communication associated with Action 1 and improved descriptions and use of stakeholder involvement and collaboration opportunities and mechanisms. Mechanisms will range from compilation and maintenance of interested parties lists to formally recognized and facilitated stakeholder forums.

Tasks:

- Prepare compendium of stakeholder involvement opportunities and mechanisms, with recommendations.
- Provide training in public process facilitation and negotiation/conflict resolution for staff and stakeholders.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Compendium of stakeholder mechanisms	February 2002
Training	Ongoing (beginning February 2002)

Action 3: Outreach and Communication

Description: Methods that Regional Boards are using for outreach and communication will be surveyed and described. Key stakeholders will be identified. Other approaches to outreach and public process will be evaluated and training in outreach and public process will be provided. Methods for documenting and tracking public involvement in TMDL development will be evaluated and established where feasible. We will develop informational items that can be used to communicate current activities in TMDL development. Web based bulletin boards will be evaluated and developed where feasible. Lists of interested parties (other agencies, stakeholders, and public) will be established and mechanisms to communicate with them (e.g., reports, web site) will be evaluated and established. We will compile relevant information on the TMDL program and TMDL projects. This action area will be coordinated with the information management actions described under Strategy B above.

Tasks:

- Report on Regional Board outreach methods and other available public process techniques.
- Develop and offer outreach training.
- Develop and distribute informational materials, in coordination with OLPA, including TMDL fact sheets for each TMDL unit.
- Enhance TMDL web site.
- Convene biennial or triennial TMDL conferences with State and Regional Board staff and stakeholders.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Methods report	November 2001
Outreach materials	Ongoing
Training module	March 2002
TMDL project fact sheets	March 2002
Enhanced TMDL web site	March 2002
TMDL conference schedule	May 2002

Action 3: Interagency Coordination and Collaboration

Description: Opportunities to enhance coordination and collaboration with other agencies will be pursued. Our TMDL efforts overlap authorities and programs of other agencies. Certain TMDLs are dependent on efforts by these other agencies (e.g., pesticide TMDLs and the USEPA and DPR). In some cases, actions by other agencies may even conflict with or create barriers to TMDL efforts. These opportunities, overlaps, conflicts, and barriers will be identified and appropriate resolutions, agreements, etc. will be pursued.

Tasks, products, due dates, etc. to be determined.

E. Early Implementation

We will pursue opportunities for early actions that promote or possibly eliminate the need for TMDLs using existing authorities, program integration, process improvements, and stakeholder assistance and collaboration. Such opportunities may include: evaluating existing actions that may be recognized in the implementation plan for a TMDL; groundtruthing or pilot testing potential actions that may or are being considered for an implementation plan; and identifying and evaluating actions that if implemented may negate the need for a TMDL, such as implementation of existing technology-based requirements or enhancements of them, or clean-up and abatement of hotspots or illicit discharges.

Action 1: Implement Existing Authorities

Description: Pursue opportunities for early action through existing authorities and program integration including implementation and evaluation of existing requirements.

Tasks:

- Review and clarify technology-based requirements for wastewater and stormwater discharges subject to NPDES permits for control of pollutants causing impairment.
- Review and clarify best management practices for nonpoint source discharges for control of pollutants causing impairment.
- Identify toxic hot spots and/or illicit discharges (particularly those currently subject to regulatory action by a Regional Board) that are causing or may be contributing to water quality impairment.
- Assimilate regulatory requirements/pollutant control information into a matrix or other suitable framework that provides access to such information.
- Pursue stakeholder participation (e.g., Stormwater Quality Task Force) in this process.
- Develop “early alarm system” to notify non-TMDL staff when an activity (e.g., issuing a landfill WDR) is relevant to a scheduled or ongoing TMDL effort, and to alert staff to opportunities to implement actions relevant to TMDLs.
- Apply and track existing requirements on a TMDL pollutant category or project-specific basis.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
Matrix of regulatory requirements/pollutant control information	Six-month updates starting March 2002
Stakeholder participation	Six-month updates starting March 2002
Use of existing authorities/requirements	Six-month updates starting March 2002
Establish “early implementation alarm”	September 2002

Action 2: Evaluate Potential Actions

Description: Evaluate (groundtruth or pilot test) potential actions for consideration in TMDL implementation plans.

Tasks:

- Identify potential actions for consideration in TMDL implementation plans on a TMDL pollutant category or project-specific basis (clean-up of PCBs within a storm drain).
- Implement and track special studies or pilot projects to evaluate such potential actions.
- Solicit stakeholder participation/assistance including creation of incentives/rewards.

- Assimilate potential action information into accessible framework.

Products/Deliverables and Due Dates:

PRODUCT/DELIVERABLE	DUE DATE
List of potential actions	Six-month updates starting March 2002
List/status of special studies or pilot projects	Six-month updates starting March 2002
Compilation of potential action information	Six-month updates starting March 2002

F. Monitoring and Assessment

We will continue to design and implement a comprehensive statewide Surface Water Ambient Monitoring Program (SWAMP) to improve identification of impaired or threatened waters. We will augment SWAMP, where appropriate, with monitoring required by or associated with other water quality programs (NPDES, Storm Water, Nonpoint Source programs, etc.) and with monitoring conducted by other agencies (U.S. Geological Survey, Department of Water Resources, Department of Pesticide Regulation [DPR], etc.). We will also improve assessment methods and refine environmental indicators. Decision support tools to identify when sufficient information exists for TMDL activities will be developed.

Actions, tasks, products, due dates, etc. to be determined.

G. Basin Planning

We will streamline and improve the existing basin planning process based on the new Administrative Procedures Manual chapter on basin planning using the through training, enhanced coordination and communication, and resourcefulness. We will also pursue options to revise or modify the existing process.

Actions, tasks, products, due dates, etc. to be determined.

H. TMDL Implementation

We will establish procedures and requirements to implement TMDLs in general and to implement specific TMDLs. We will establish procedures to track and enforce TMDL implementation actions and to monitor effectiveness of actions. We will also establish adaptive management procedures to ensure that implementation actions result in attainment of water quality standards. We will use and enhance existing regulatory mechanisms, and where necessary, establish new ones or seek collaboration with other agencies with applicable authorities.

Actions, tasks, products, due dates, etc. to be determined.

I. Budget Development and Management

We will address budget issues relevant to TMDL efforts. They include: assessment and management of existing budget allocations; use or redirection of funds associated with other programs; development of initiatives to seek additional resources through the State budget process; and development of initiatives to seek resources through external sources such as dischargers or other collaborators.

Action 1: TMDL Budget Management

Description: We will document allocation and use of existing TMDL funds and revise the Budget Development and Administration System (BDAS) to reflect allocated resources and to conform to the TMDL program workplan. We will resolve inconsistencies between budget authority, budget amounts, and the TMDL program workplan. We will also establish procedures and provide training for TMDL budget management.

Tasks, products, due dates, etc. to be determined.

Action 2: Program Fund Integration

Description: TMDL efforts encompass activities associated with nearly all other water quality programs (e.g., NPDES, Storm Water, and Nonpoint Source programs). We will identify tasks associated with these programs that are part of or affect TMDLs (e.g., pollutant source identification, evaluation of pollution prevention or control actions). Where appropriate, we will use or redirect funds associated with these other programs for these tasks.

Tasks, products, due dates, etc. to be determined.

Action 3: State Budget Initiatives

Description: We will continue to use the Budget Change Proposal procedures to seek additional state resources to enhance development and implementation of TMDLs.

Tasks, products, due dates, etc. to be determined.

Action 4: External Source Support

Description: We will pursue and implement agreements with other agencies and dischargers to use and share their resources for development and implementation of TMDLs.

Tasks, products, due dates, etc. to be determined.

TMDL INITIATIVE ACTION PLAN

Edition 1.0

APPENDIX

Table 1

TMDL Regional Board Actions

By December 2002

9/14/2001

TMDL Regional Board Actions By December 2002

Region 1

TMDL Planning Unit	Milestones	Date of Action	Revised Completion Date	Actual Completion Date
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Region1 expects Regional Board consideration of at least one TMDL by December 2002.

Region 2

TMDL Planning Unit	Milestones	Date of Action	Revised Completion Date	Actual Completion Date
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San Francisco Bay - Mercury

Basin Planning	Prepare Amendment	08/2001		
	Regional Board Hearing Date	11/2001		

South San Francisco Bay - Copper

Basin Planning	Prepare Amendment	01/2002		
	Regional Board Hearing Date	06/2002		

South San Francisco Bay - Nickel

Basin Planning	Prepare Amendment	01/2002		
	Regional Board Hearing Date	06/2002		

TMDL Regional Board Actions By December 2002

Region 3

TMDL Planning Unit	Milestones	Date of Action	Revised Completion Date	Actual Completion Date
<u><i>Chorro Creek - Metals</i></u>				
Basin Planning	Prepare Amendment	06/2001		
	Regional Board Hearing Date	12/2001		
<u><i>Las Tablas Creek- Nacimiento Reservoir - Mercury</i></u>				
Basin Planning	Prepare Amendment	12/2001		
	Regional Board Hearing Date	06/2002		
<u><i>Morro Bay - Nutrients</i></u>				
Basin Planning	Prepare Amendment	12/2001		
	Regional Board Hearing Date	06/2002		
<u><i>Morro Bay - Pathogens</i></u>				
Basin Planning	Prepare Amendment	06/2002		
	Regional Board Hearing Date	12/2002		
<u><i>Morro Bay - Siltation</i></u>				
Basin Planning	Prepare Amendment	06/2001		
	Regional Board Hearing Date	12/2001		
<u><i>San Lorenzo River - Siltation</i></u>				
Basin Planning	Prepare Amendment	06/2002		
	Regional Board Hearing Date	06/2002		
<u><i>San Luis Obispo Creek - Nutrients</i></u>				
Basin Planning	Prepare Amendment	06/2002		

TMDL Regional Board Actions By December 2002

Region 4

TMDL Planning Unit	Milestones	Date of Action	Revised Completion Date	Actual Completion Date
<u><i>Ballona Creek - Coliform</i></u>				
Basin Planning	Regional Board Hearing Date	10/2001	7/1/02	
<u><i>Ballona Creek - Trash</i></u>				
Basin Planning	Regional Board Hearing Date	04/2001	8/1/01	
<u><i>Calleguas Creek - Nutrients</i></u>				
Basin Planning	Regional Board Hearing Date	01/2002		
<u><i>Dominguez Channel - Coliform</i></u>				
Basin Planning	Regional Board Hearing Date	02/2002	4/1/02	
<u><i>Los Angeles River - Coliform</i></u>				
Basin Planning	Regional Board Hearing Date	07/2001	12/1/01	
<u><i>Los Angeles River - Metals</i></u>				
Basin Planning	Regional Board Hearing Date	07/2002	6/1/02	
<u><i>Los Angeles River - Nutrients</i></u>				
Basin Planning	Regional Board Hearing Date	07/2001	12/1/01	
<u><i>Malibu Creek - Coliform</i></u>				
Basin Planning	Regional Board Hearing Date	06/2001	1/1/02	
<u><i>Malibu Creek - Nutrients</i></u>				
Basin Planning	Regional Board Hearing Date	06/2001	1/1/02	
<u><i>Marina del Rey Harbor - Coliform</i></u>				
Basin Planning	Regional Board Hearing Date	12/2002		
<u><i>McGarath Beach - Coliform</i></u>				
Basin Planning	Regional Board Hearing Date	10/2002		
<u><i>San Gabriel River - Nutrients</i></u>				
Basin Planning	Regional Board Hearing Date	11/2002		
<u><i>Santa Clara River - Chloride</i></u>				
Basin Planning	Regional Board Hearing Date	08/2001	11/1/01	12/1/00
<u><i>Santa Monica Bay Beaches - Coliform</i></u>				
Basin Planning	Regional Board Hearing Date	01/2002		

TMDL Regional Board Actions By December 2002

Region 5

TMDL Planning Unit	Milestones	Date of Action	Revised Completion Date	Actual Completion Date
<u><i>Clear Lake - Mercury</i></u>				
Basin Planning	Prepare Amendment	09/2002		
<u><i>Sacramento and Feather Rivers - Diazinon</i></u>				
Basin Planning	Prepare Amendment	06/2002		
<u><i>Sacramento River - Cadmium, Copper, Zinc</i></u>				
Basin Planning	Regional Board Hearing Date	08/2001		
<u><i>San Joaquin River - Electrical Conductivity and Boron</i></u>				
Basin Planning	Prepare Amendment	06/2002		

Region 6

TMDL Planning Unit	Milestones	Date of Action	Revised Completion Date	Actual Completion Date
<u><i>Indian Creek Reservoir - Nutrients</i></u>				
Basin Planning	Regional Board Hearing Date	06/2002		

Region 7

TMDL Planning Unit	Milestones	Date of Action	Revised Completion Date	Actual Completion Date
<u><i>New River - Sediment</i></u>				
Basin Planning	Regional Board Hearing Date	12/2001		

TMDL Regional Board Actions By December 2002

Region 8

TMDL Planning Unit	Milestones	Date of Action	Revised Completion Date	Actual Completion Date
<u><i>Newport Bay - diazinon, chlopyrifos</i></u>				
Basin Planning	Regional Board Hearing Date	05/2002		
<u><i>Newport Bay - selenium</i></u>				
Basin Planning	Regional Board Hearing Date	12/2002		

Region 9

TMDL Planning Unit	Milestones	Date of Action	Revised Completion Date	Actual Completion Date
<u><i>Chollas Creek - Diazinon</i></u>				
Basin Planning	Prepare Amendment	07/2002	7/1/02	
	Regional Board Hearing Date	04/2002		
<u><i>Chollas Creek - Metals</i></u>				
Basin Planning	Prepare Amendment	01/2002	12/1/02	
	Regional Board Hearing Date	08/2002		
<u><i>Rainbow Creek - Nutrients</i></u>				
Basin Planning	Regional Board Hearing Date	04/2002		
Implementation	Prepare Amendment	07/2001	7/1/02	
<u><i>San Diego Bay - Shelter Island Yacht Basin - Dissolved Copper</i></u>				
Basin Planning	Prepare Amendment	07/2002	10/1/02	
	Regional Board Hearing Date	08/2002		

TMDL Initiative Action Plan Timeline

Strategy-Action-Product September October November December January February March **Spring 02** **Summer 02** **Fall 02** **Winter 03** **Other**

Strategy-Action-Product	September	October	November	December	January	February	March	Spring 02	Summer 02	Fall 02	Winter 03	Other
A. Program Structure and Management												
Action 1: Structure Assessment												
Statement of Expectations												
Report on Structure												
Structure Improvement Plan												
MCC review and approval												
Plan implementation												
Action 2: Program Integration												
Matrix of affected programs												
Program interrelationship report												
Key roles and responsibilities												
Assign staff & functions												
Action 3: Program Management												
Roles of Management Advocates												
Program management description												
Report on expectations												
Memo announcing Advocates												
Action 4: Internal Communication												
TMDL symposium												
Communication pathways and expectations												
Communication procedures												
TMDL symposium												
B. Information Management												
Action 1a: Database - Phase 1												
Database conversion & user guide												
FY 2001/02 data entry												
Report formats & revised user guide												
FY 2001/02 report												
Data entry 2002-04 data												
Action 1b: Database - Phase 2												
Enhanced data fields												
Added data entry												
Enhanced reports/revised user guide												
TMDL project workplans/ fact sheets												
Action 2: E-Workplan												
FY 01/02 e-workplan												
Draft 02/03 e-workplan data entry												
Revise 02/03 data												
Final FY 02/03 e-workplan												

Table 2

Strategy-Action-Product	September	October	November	December	January	February	March	Spring 02	Summer 02	Fall 02	Winter 03	Other
Action 3: Intranet/internet Web Pages												
TBD												
Action 4: Tracking reports												
TBD												
Action 5: Legislative Reports												
TBD												
Action 6: Contract Development & Management												
TBD												
C. TMDL Toolbox and Guidelines												
Action 1: Listing guidelines												
Summary of key issues												
Revised summary of issues												
Working draft policy												
Draft policy												
State Board consideration												
OAL approval												
Action 2: Categorical TMDL Tools												
Form workgroups												
Compile existing tools												
Identify additional tools												
Draft tools and guidelines												
Initiate approval process												
Establish strike teams												
Action 3: TMDL Elements Tools												
Form workgroups												
Compile existing tools												
Identify additional tools												
Draft tools and guidelines												
Initiate approval process												
Establish strike teams												
Action 4: TMDL Program Guidelines												
Coordinate workgroups												
Draft consolidated guidelines												Jul-03
Final TMDL development guidelines												Jan-04
D. Outreach, Communication, and Participation												
Action 1: PAG Involvement and collaboration												
Tbl. strategies/actions x recommendations												
Initiative and Action Plan, PAG review												
PAG comments/ revised Action Plan												

Table 2

Strategy-Action-Product	September	October	November	December	January	February	March	Spring 02	Summer 02	Fall 02	Winter 03	Other
Action 2: Stakeholder Involvement and Collaboration												
Compendium of stakeholder mechanisms												
Training						ongoing beginning February 2002						
Action 3: Outreach and Communication												
Methods report												
Outreach materials	ongoing											
Training module												
TMDL project fact sheets												
Enhanced TMDL web site												
TMDL conference schedule												
Action 4: Interagency Coordination & Collaboration												
TBD												
E. Early Implementation												
Action 1: Implement Existing Authorities												
Matrix of regulatory requirements/controls								6 month updates beginning March 2002				
Stakeholder participation								6 month updates beginning March 2002				
Use of existing authorities/reguirements								6 month updates beginning March 2002				
Early implementation "alarm"												
Action 2: Evaluate Potential Actions												
List of potential actions								6 month updates beginning March 2002				
List/status of special studies or pilots								6 month updates beginning March 2002				
Compendium of potential actions								6 month updates beginning March 2002				
F. Monitoring												
Actions TBD												
G. Basin Planning												
Actions TBD												
H. TMDL Implementation												
Actions TBD												
I. Budget Development and Management												
Action 1: Budget Management												
TBD												
Action 2: Program Fund Integration												
TBD												
Action 3: State Budget Initiatives												
TBD												
Action 4: External Source Support												
TBD												

Draft - Proposed TMDL Guideline Schedule

September-01

Task	Fall 01	Winter 02	Spring 02	Summer 02	Fall 02	Winter 03	Spring 03	Summer 03	Fall 03	Winter 04
Review and finalize schedule										
Workgroup assistance contract	▨	▨								
Form Categorical Workgroups	▨									
Compile existing categorical tools	▨	▨								
Identify tools, needs, issues	▨	▨								
Form TMDL elements workgroup			▨							
Complete draft categorical guidelines	▨	▨	▨	▨						
Compile existing element tools				▨	▨					
Identify tools, needs, issues for elements				▨	▨					
Complete draft elements guidelines				▨	▨	▨				
DWQ Consolidate draft elements and category guidelines						▨	▨			
Workgroup and Public review of draft consolidated guidelines							▨	▨		
Approval process for guidelines									▨	▨

Production of guidelines for developing TMDLs will be coordinated by DWQ and rely on workgroups on categorical TMDL tools and TMDL element tools. DWQ will consolidate products from the workgroups to form the draft guidelines. Workgroups will be supported by facilitators and administrative support provided through contract services.